

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492  
Case No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Brown

**JOINT MOTION FOR ENTRY OF REVISED SCHEDULE**

The Settlement Class Representatives and Defendant National Collegiate Athletic Association (“NCAA,” and together with Settlement Class Representatives, the “Parties”) respectfully request that the Court enter a revised schedule for the consideration of final approval of the Second Amended Class Action Settlement Agreement and Release, any objections thereto, and any requests for payment of attorneys’ fees and costs.<sup>1</sup> In support thereof, the Parties state as follows:

1. On May 9, 2017, the Court approved the amended estimated budget for the Notice Plan. The Court also authorized the Notice Administrator to proceed with the second wave of direct notice to be provided by regular mail and email using Settlement Class Member contact information received from NCAA member institutions.

2. The Notice Administrator has represented that the second wave of direct notice will begin approximately three weeks from May 9, 2017, during which time the Notice Administrator will clean up the address data it has received and prepare the mailings.

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<sup>1</sup> Unless otherwise defined, capitalized terms have the meaning ascribed to them in the Second Amended Settlement Agreement, which is Exhibit 1 to the joint motion for preliminary approval filed with the Court on May 20, 2016. *See* Second Am. Settlement Agt. (Dkt. #266-1).

3. Accordingly, the Parties propose that the deadlines set forth in the Court's July 15, 2016 Preliminary Approval Order be revised as follows:

<b>Action</b>	<b>Date Set Forth in July 15, 2016 Preliminary Approval Order</b>	<b>Proposed New Date</b>
Second wave of direct notice to be issued	Not addressed	May 30-June 6, 2017
Deadline for Settlement Class Members to object to or opt out of the Settlement	March 10, 2017	August 4, 2017
Deadline for any objections or responses to the petitions for attorneys' fees and costs	March 10, 2017	August 4, 2017
Notice Administrator shall file with the Court the Opt-Out List with an affidavit attesting to the completeness and accuracy thereof	April 21, 2017	August 18, 2017
Notice Administrator and Program Administrator shall file declarations with the Court concerning implementation of the Notice program and other terms of the Settlement	April 21, 2017	August 18, 2017
Deadline for filing Motion for Final Approval of the Settlement, including any responses to objections	March 31, 2017	August 25, 2017
Fairness Hearing	May 5, 2017 at 10:00 a.m.	At the Court's convenience on or after September 15, 2017

WHEREFORE, the Settlement Class Representatives and NCAA respectfully request that the Court enter the revised schedule. A Proposed Order is attached hereto. The Parties further request whatever other relief the Court deems appropriate.

Dated: May 18, 2017

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on May 18, 2017, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Steve W. Berman  
Steve W. Berman